

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JULIE A. SU,	)	
ACTING SECRETARY OF LABOR,	)	
UNITED STATES DEPARTMENT OF LABOR,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:21-cv-1391-DSC
	)	
INTRA-NATIONAL HOME CARE, LLC, AND	)	
DILLI ADHIKARI,	)	
	)	
Defendants.	)	
	)	

**MOTION FOR ADDITIONAL PAGES FOR SUMMARY JUDGMENT BRIEFS**

On October 12, 2023, this Court granted extended the page limit for motions from summary judgment from 25 to 30 pages. ECF 114. On October 16, 2023 and October 19, 2023, the parties filed cross-motions for summary judgment and partial summary judgment. ECF 119 and 129. On July 1, 2024, this Court issued an Order denying without prejudice the parties' cross-motions for summary judgment in light of the U.S. Supreme Court's decision in *Loper Bright Enterprises v. Raimondo*, 143 S.Ct. 2635 (2024). In the interest of judicial efficiency, the Court authorized the parties to re-file their motions "on or after September 6, 2024" to address *Loper Bright* and "any immediate applications thereof by other courts." ECF 150. At the parties' request, the Court extended the due date for summary judgment motions to November 18, 2024. ECF 153.

To address the issues raised in *Loper Bright* and its applications by other courts, Plaintiff asks the Court extend the page limit for memoranda in support of summary judgment to 35-

pages. Plaintiff has repeatedly asked Defendants' counsel for his position regarding this motion but received no response.

WHEREFORE, Plaintiff respectfully request that this Motion be GRANTED.

Respectfully submitted,

**UNITED STATES DEPARTMENT OF  
LABOR**

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/s/ Andrea Luby  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this October 18, 2024, the foregoing was filed with the Court's CM/ECF system and served on all counsel of record.

/s/ Andrea Luby  
Andrea Luby